

**BEFORE THE  
PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA**

**DOCKET NO. 2022-2-E**

IN RE: Annual Review of Base Rates for ) **CMC STEEL SOUTH CAROLINA’S**  
Fuel Costs for Dominion Energy South ) **SECOND SET OF**  
Carolina, Inc. ) **CONTINUING DATA REQUESTS**  
) **TO DOMINION**

CMC Steel South Carolina (“CMC”) hereby propounds the following data requests to Dominion Energy South Carolina (“Dominion”) and requests that the information and documents requested below be provided within 10 days of receipt of this request by Dominion. These requests are continuing in nature and Dominion is requested to provide any and all information available as of the date of the response and then complete or update the response as necessary as additional information becomes available.

**INSTRUCTIONS**

1. In answering each Request, please state the text of the Request prior to providing the response. Each Request and applicable response should be on a separate page. Where there are subparts to a Request, each subpart and applicable response should be on a separate page. Each Request is continuing in nature. Thus, if Dominion acquires or discovers additional or different information with respect to a Request after the Request has been initially answered, Dominion is required to supplement its response immediately following the receipt of such additional or different information, giving the additional or different information to the same extent as originally requested. Dominion may not postpone serving such responsive supplemental information until after the filing of any testimony or supporting documents in this proceeding. Initial and supplementary responses shall be full, complete and accurate since they will be relied upon by CMC for the purposes of this proceeding. For each Request, list all assumptions made by Dominion in answering said Request.
2. In the event that Dominion asserts that any of the information requested is deemed by it to be privileged or proprietary, then Dominion in its written response should identify any such data, and any supporting documents, by date and general content. Dominion should also identify all persons who participated in the preparation of the document and all persons, inside or outside Dominion, who received a copy, read, or examined any such document. In addition, Dominion should indicate its claim of privilege with particularity and describe the grounds upon which privilege is claimed. State the present location of the document and all copies thereof and identify each person having custody or control of the document and said copies.
3. To the extent that Dominion asserts that any requested information is not relevant or not material to any issue in the above-captioned matter, Dominion, in its written response hereto, should indicate a specific basis for said assertion in the context of any issues arising in this proceeding.

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4. In the event Dominion asserts that any requested information is not available in the form requested, Dominion, in its written response thereto, should disclose the following:
  - (a) the form in which the requested data currently exists (identifying documents by title);
  - (b) whether it is possible under any circumstances for Dominion to provide the data in the form requested;
  - (c) the procedures or calculation necessary to provide the data in the form requested;
  - (d) the length of time (in hours or days) necessary for Dominion to prepare the data in the form requested; and
  - (e) the earliest dates, time period, and location that representatives of CMC may inspect Dominion's files, records or documents in which the requested information currently exists.
5. The Requests contained herein contemplate that individual copies of any documentary material requested will be provided to CMC as is the usual custom in regulatory proceedings. In the event that Dominion asserts that any requested documents are too voluminous, or, for some other reason, copies cannot be provided to CMC, Dominion is requested to make such voluminous or otherwise undeliverable documentary material available for inspection as of the date of the required written responses at such time and place as may be mutually agreed upon among counsel for the parties. Dominion is requested to provide notice to CMC at least two Business Days in advance of the date of the required written responses that it contemplates asserting that any requested documents will be too voluminous to provide CMC with individual copies, or will otherwise be undeliverable according to Dominion. Dominion is also requested to provide notice no less than 2 Business Days in advance of the date of required written responses estimating the size and character of any voluminous materials and/or documents, and to provide copying of any noticed materials pursuant to CMC's designation at CMC's expense at that time.
6. In providing documents, Dominion is requested to furnish all documents or items in its physical possession or custody, as well as those materials under the physical possession, custody or control of any other person acting or purporting to act on behalf of Dominion or any of Dominion's employees or representatives, whether as an agent, independent contractor, attorney, consultant, witness, or otherwise. If documents responsive to a request existed at one time but have been discarded, lost or destroyed, please describe by category such documents, state the identity of the person having knowledge of the circumstances of their discard, loss or destruction, and state the date on which such documents were discarded, lost or destroyed.
7. To the extent any requested document cannot be provided in full, it shall be provided to the extent possible, with an indication of what document or portion of what document is being withheld and the reasons for withholding said document.
8. Documents are to be produced as they are kept in the usual course of business. To the extent that they are attached to each other, documents should not be separated.

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9. Documents not otherwise responsive to this Request shall be provided if such documents are attached to documents responsive to this Request, and constitute routing slips, transmittal memoranda, letters, comments, evaluations, or similar materials.
10. For each Request answered, provide the name of the person or persons answering, the title of such persons and the name of the witness or witnesses who will be prepared to testify concerning the matters contained in each response or document provided. Dominion shall provide all responses under oath.
11. Unless otherwise indicated, the following Requests shall require you to furnish information and tangible materials pertaining to, in existence, or in effect for the whole or any part of the period from January 1, 2018, through and including the date of your response.
12. Where these Requests seek quantitative or computational information (*e.g.*, models, analyses, databases, formulas) stored by Dominion or its consultants in machine-readable form, in addition to providing a hard copy, Dominion is requested to furnish such machine-readable information in MS Excel file format.
13. To the extent possible, where these Requests seek non-quantitative narrative information (*e.g.*, studies, reports, memorandum, correspondence) stored by Dominion or its consultants in machine readable form, in addition to providing a hard copy, Dominion is requested to furnish such machine-readable information in MS Word format.
14. Responses to any of these Requests may include incorporation by reference to responses to other Requests only under the following circumstances:
  - (a) the reference is explicit and complies with instruction 11; and
  - (b) unless the entirety of the referenced response is to be incorporated, the specific information or documents of the referenced response shall be expressly identified.
15. CMC requests that Dominion send electronically, followed by hard copy, one copy of its responses to this Request to each of the following:

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Damon E. Xenopoulos, Esq.  
Stone Mattheis Xenopoulos & Brew, PC  
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dex@smxblaw.com

Responsive information and documents should be provided as they become available and should not be withheld until a complete response to all of CMC's requests is available.

**DEFINITIONS**

1. "Dominion" refers to Dominion Energy South Carolina, its parent(s), subsidiaries, affiliates, predecessors, successors, officers, directors, agents, employees, and other persons acting in its behalf.
2. "PSC" means the South Carolina Public Service Commission.
3. "CMC" means CMC Steel South Carolina.
4. "Identify" means as follows:
  - (a) when used in reference to an individual, to state his full name and present or last known residence address and telephone number, his present or last known position and business affiliation, and his position and business affiliation at the time in question;
  - (b) when used in reference to a commercial or governmental entity, to state its full name, type of entity (*e.g.*, corporation, partnership, single proprietorship), and its present or last known address;
  - (c) when used in reference to a document, to state the date, author, title, type of document (*e.g.*, letter, memorandum, photograph, tape recording, etc.) and its present or last known location and custodian;
  - (d) when used in reference to a communication, to state the type of communication (*i.e.*, letter, personal conversation, etc.), the date thereof, and the parties thereto and, in the case of a conversation, to state the substance, place, and approximate time thereof, and identity of other persons in the presence of each party thereto; and
  - (e) when used in reference to an act, to state the substance of the act, the date, time, and place of performance, and the identity of the actor and all other persons present.
7. The term "document" as used in the Requests contained herein is used in its customary broad sense, and includes, without limitation, any kind of printed, recorded, written, graphic, or photographic matter and things similar to any of the foregoing, regardless of their author or origin. The term specifically includes reports, studies, statistics, projections, forecasts, decisions and orders, e-mail communications, intra-office and inter-office communications, correspondence, memoranda, financial data, summaries or records of conversations or interviews, statements, returns, diaries, workpapers, graphs, sketches, computer printouts, summaries or reports of investigations or negotiations, opinions or reports of consultants, photographs, brochures, bulletins, pamphlets, books, articles, advertisements, circulars, press releases, graphic records or representations or publications of any kind (including microfilm, videotape and records, however produced or reproduced), electronic, mechanical and electrical records of any kind (including, without

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limitation, tapes, tape cassettes, disks and records), other data compilations (including, without limitation, input/output files, source codes, object codes, program documentation, computer programs, computer printouts, cards, tapes, disks and recordings used in automated data processing together with the programming instructions and other material necessary to translate, understand or use the same), all drafts, prints, issues, alterations, modifications, changes and amendments to the foregoing, and all other documents or tangible things of whatever description that constitute or contain information within the scope of a Request that are in the possession of Dominion. A Request seeking the identification or production of documents addressing, relating or referring to, or discussing a specified matter encompasses documents having a factual, contextual, or logical nexus to the matter, as well as documents making explicit or implicit reference thereto in the body of the documents. Originals and duplicates of the same document need not be separately identified or provided; however, drafts of a document or documents differing from one another by initials, interlineations, notations, erasures, file stamps, and the like shall be deemed to be distinct documents requiring separate identification or production.

8. "Communication" shall mean any transmission of information by oral, graphic, written, pictorial, or otherwise perceptible means, including, but not limited to, telephone conversations, letters, telegrams, e-mail and personal conversations. A Request seeking the identity of a communication addressing, relating or referring to, or discussing a specified matter encompasses documents having factual, contextual, or logical nexus to the matter, as well as communications in which explicit or implicit reference is made to the matter in the course of the communication.
9. The "substance" of a communication or act includes the essence, purport or meaning of the same, as well as the exact words or actions involved.
10. Words expressing the singular number shall be deemed to express the plural number; those expressing the masculine gender shall be deemed to express the feminine and neuter genders; those expressing the past tense shall be deemed to express the present tense; and vice versa.
11. The unqualified terms "or" and "and" shall be construed either conjunctively or disjunctively to bring within the scope of these Requests any matters that might otherwise be construed to be outside their scope.
12. The unqualified term "person" shall mean an individual, corporation, partnership, unincorporated association or other business or governmental entity.
13. The term "*e.g.*" or "for example" indicates illustration by example, not limitation.

**REQUESTS**

- CMC-2-1 Please refer to the direct testimony of George A. Lippard, III. Witness Lippard describes an unplanned outage at VCSNS that occurred when the unit was returning to full power; the unit experienced significant failure and remained offline for

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approximately 25 days. Please respond to the following requests related to this outage. As to all subparts, please explain in detail and provide Excel spreadsheets with all links and formulas intact:

- (a) Please explain why the unit failed.
- (b) Please explain why the unit remained offline for more than three weeks.
- (c) Please identify and explain the steps Dominion took to restart the unit and bring it back to normal operations.
- (d) Please (i) describe the manner in which Dominion dealt with the loss of this generation (*i.e.*, how Dominion covered this loss and why Dominion chose the solution(s) it did), (ii) identify the source(s) of the generation/energy Dominion used to cover the loss, (iii) provide the quantity and cost per source of the generation/energy Dominion used to cover the loss, (iv) provide the reason(s) why Dominion selected said source(s), and (v) identify the department and employee(s)/witness(es) responsible for these decisions.
- (e) Please explain how said outage affected the fuel costs under review in this proceeding, including the incremental cost of fuel incurred as a result of the outage. Explain in detail how the incremental cost was calculated.
- (f) If the Company contends that the outage did not inflate the fuel costs incurred in the period, explain in detail.
- (g) Please provide all documentation, including studies, reports, root cause analyses, etc., regarding (i) the cause(s) of the outage, and (ii) the repairs that were made.
- (h) Were Dominion's activities and efforts, both before and after the outage, prudent? Explain in detail.
- (i) Has Dominion included in this case fuel costs that were incurred due to the outage referred to above? If not, please explain. If so, please explain why Dominion is allowed to collect said costs.

CMC-2-2 Please refer to the direct testimony of Henry E. Delk, Jr. Witness Delk describes a significant forced outage at Wateree Unit 2 beginning on February 19, 2020, following an explosion. Witness Delk explains that this unit remains out of service. Please respond to the following requests related to this outage. As to all subparts, please explain in detail and provide Excel spreadsheets with all links and formulas intact:

- (a) Please explain why the unit failed.
- (b) Please explain why the unit remains offline.

- (c) Please identify and explain the steps Dominion is taking to restart the unit and bring it back to normal operations.
- (d) Please (i) describe the manner in which Dominion dealt with the loss of this generation (*i.e.*, how Dominion covered this loss and why Dominion chose the solution(s) it did), (ii) identify the source(s) of the generation/energy Dominion used to cover the loss, (iii) provide the quantity and cost per source of the generation/energy Dominion used to cover the loss, (iv) provide the reason(s) why Dominion selected said source(s), and (v) identify the department and employee(s)/witness(es) responsible for these decisions.
- (e) Please explain how said outage affected the fuel costs under review in this proceeding, including the incremental cost of fuel incurred as a result of the outage. Explain in detail how the incremental cost was calculated.
- (f) If the Company contends that the outage did not inflate the fuel costs incurred in the period, explain in detail.
- (g) Please provide all documentation, including studies, reports, root cause analyses, etc., regarding (i) the cause(s) of the outage, and (ii) the repairs that were made.
- (h) Were Dominion's activities and efforts, both before and during the outage, prudent? Explain in detail.
- (i) Has Dominion included in this case fuel costs that were incurred due to the outage referred to above? If not, please explain. If so, please explain why Dominion is allowed to collect said costs.

CMC-2-3 Please refer to the direct testimony of Henry E. Delk, Jr. Witness Delk describes a significant forced outage of multiple units at the Columbia Energy Center lasting approximately one month. Please respond to the following requests related to this outage. As to all subparts, please explain in detail and provide Excel spreadsheets with all links and formulas intact:

- (a) Please explain why the units failed.
- (b) Please explain why the units remained offline for approximately one month.
- (c) Please identify and explain the steps Dominion took to restart the units and bring them back to normal operations.
- (d) Please (i) describe the manner in which Dominion dealt with the loss of this generation (*i.e.*, how Dominion covered this loss and why Dominion chose the solution(s) it did), (ii) identify the source(s) of the generation/energy Dominion

used to cover the loss, (iii) provide the quantity and cost per source of the generation/energy Dominion used to cover the loss, (iv) provide the reason(s) why Dominion selected said source(s), and (iv) identify the department and employee(s)/witness(es) responsible for these decisions.

- (e) Please explain how said outage affected the fuel costs under review in this proceeding, including the incremental cost of fuel incurred as a result of the outage. Explain in detail how the incremental cost was calculated.
- (f) If the Company contends that the outage did not inflate the fuel costs incurred in the period, explain in detail.
- (g) Please provide all documentation, including studies, reports, root cause analyses, etc., regarding (i) the cause(s) of the outage, and (ii) the repairs that were made.
- (h) Were Dominion's activities and efforts, both before and after the outage, prudent? Explain in detail.
- (i) Has Dominion included in this case fuel costs that were incurred due to the outage referred to above? If not, please explain. If so, please explain why Dominion is allowed to collect said costs.

CMC-2-4 Please refer to the direct testimony of Henry E. Delk, Jr. Witness Delk describes a significant forced outage at Urquhart Unit 6 lasting 16 days that occurred while attempting to return to service after a scheduled outage. Please respond to the following requests related to this outage. As to all subparts, please explain in detail and provide Excel spreadsheets with all links and formulas intact:

- (a) Please explain why the unit failed.
- (b) Please explain why the unit remained offline for more than two weeks.
- (c) Please identify and explain the steps Dominion took to restart the unit and bring it back to normal operations.
- (d) Please (i) describe the manner in which Dominion dealt with the loss of this generation (*i.e.*, how Dominion covered this loss and why Dominion chose the solution(s) it did), (ii) identify the source(s) of the generation/energy Dominion used to cover the loss, (iii) provide the quantity and cost per source of the generation/energy Dominion used to cover the loss, (iv) provide the reason(s) why Dominion selected said source(s), and (iv) identify the department and employee(s)/witness(es) responsible for these decisions.

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- (e) Please explain how said outage affected the fuel costs under review in this proceeding, including the incremental cost of fuel incurred as a result of the outage. Explain in detail how the incremental cost was calculated.
- (f) If the Company contends that the outage did not inflate the fuel costs incurred in the period, explain in detail.
- (g) Please provide all documentation, including studies, reports, root cause analyses, etc., regarding (i) the cause(s) of the outage, and (ii) the repairs that were made.
- (h) Were Dominion's activities and efforts, both before and after the outage, prudent? Explain in detail.
- (i) Has Dominion included in this case fuel costs that were incurred due to the outage referred to above? If not, please explain. If so, please explain why Dominion is allowed to collect said costs.

CMC-2-5 Please refer to Exhibit AWR-1, which reflects Dominion's actual and forecast fuel cost for the period January 2021 through April 2023. Please provide, in similar form to AWR-1, Dominion's actual generation (*i.e.*, kWh or MWh) by generation type and forecast generation by generation type for the period under review.

Respectfully submitted,

/s/ Alexander G. Shissias

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**BEFORE THE  
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

IN RE: Annual Review of Base Rates for )  
Fuel Costs for Dominion Energy South ) Docket No. 2022-2-E  
Carolina, Inc. )

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served one (1) copy of the foregoing document upon the following parties to this proceeding via Electronic Mail:

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*Local Counsel for CMC Steel South Carolina*

Dated: March 4, 2022